



This legislation's enactment raises significant issues as to the continued justiciability of Plaintiffs' claims in the First Amendment Complaint above and beyond the existing issue of Plaintiffs' standing. (*See* Am. Compl., D.E. 102, PageID# 648-57). Defendants anticipate filing an appropriate motion addressing these issues upon the Bill becoming effective.

Respectfully submitted,

JONATHAN SKRMETTI  
Attorney General and Reporter

/s/ Zachary L. Barker

ZACHARY L. BARKER, BPR # 035933  
Senior Assistant Attorney General

DAWN JORDAN  
Special Counsel

DAVID RUDOLPH  
Senior Assistant Attorney General

ROBERT WILSON  
Senior Assistant Attorney General

Office of the Attorney General  
P.O. Box 20207  
Nashville, TN 37202-0207  
[Zachary.Barker@ag.tn.gov](mailto:Zachary.Barker@ag.tn.gov)

*Counsel for Defendants*

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the above document has been forwarded electronically. Notice of this filing will be sent by the Court's electronic filing system to the parties named below. Parties may access this filing through the Court's electronic filing system.

Blair Bowie  
Danielle Lang  
Alice C. Huling  
Valencia Richardson  
Aseem Mulji  
Ellen Boettcher  
Kate Uyeda  
Kathryn Huddleston  
Campaign Legal Center  
1101 14<sup>th</sup> Street NW, Suite 400  
Washington, DC 20005

Phil Telfeyan  
Natasha Baker  
Equal Justice Under Law  
400 7<sup>th</sup> St. NW, Suite 602  
Washington, DC 20004

Charles K. Grant  
Denmark J. Grant  
Baker, Donelson, Bearman  
Caldwell & Berkowitz, P.C.  
1600 West End Avenue, Suite 2000  
Nashville, TN 37203

Keeda Haynes  
Free Hearts  
2013 25<sup>th</sup> Ave. N.  
Nashville, TN 37208

Date: April 15, 2025

s/ Zachary L. Barker  
Zachary L. Barker  
Senior Assistant Attorney General